

REMARKS

The Objection to Claim 20

Applicants have corrected the grammatical error in claim 20. Accordingly, Applicants respectfully request withdrawal of the objection to claim 20.

The Section 102 Rejections

Claims 1, 3, 9, 11-12, 14, 20 and 22 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Publication No. 2003/0143999 to Funato et al. (“Funato”). Applicants respectfully disagree and traverse these rejections for at least the following reasons.

Claims 1, 11, 12 and 22 include the feature of generating *a sum* of weighted values associated with *each cell* within a wireless network.

In contrast, Funato appears to disclose the generation of paging costs that are based on two “base station routers(BSRs)”, not each (i.e., all) router within a wireless network. Further, Funato’s computation of a paging cost does not involve a summation or a sum of weighted values as in the claims of the present invention. Nor is the computation of a weighted sum suggested in Funato because only two BSRs at a time are considered; there is no need to compute a sum.

Because Funato does not disclose each and every element of claims 1, 3, 9, 11-12, 14, 20 and 22 it cannot anticipate these claims. Accordingly, Applicants respectfully request withdrawal of the pending rejections and allowance of claims 1, 3, 9, 11-12, 14, 20 and 22.

The Section 103 Rejections

(i) Claims 2, 5, 7, 13, 16 and 18

Claims 2, 5, 7, 13, 16 and 18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Funato in further view of U.S. Patent No. 6,008,704 to Opsahl et al. (“Opsahl”). Applicants respectfully disagree and traverse these rejections for at least the following reasons.

Applicants note that these claims depend on one of independent claims 1 or 12, and therefore, are patentable over a combination of Funato and Opsahl for the reasons set forth above and because Opsahl does not make up for the deficiencies of Funato described above.

Accordingly, Applicants respectfully request withdrawal of the rejections and allowance of claims 2, 5, 7, 13, 16 and 18.

(ii) Claims 6, 10, 17 and 21

In addition, claims 6, 10, 17 and 21 were rejected under 35 U.S.C. §103(a) as being unpatentable over Funato in further view of U.S. Patent No. 6,973,098 to Lundby et al. (“Lundby”). Applicants respectfully disagree and traverse these rejections for at least the following reasons.

Applicants note that each of the claims depends on one of independent claims 1 or 12 and are, therefore, patentable over the combination of Funato and Lundby for at least the reasons set forth above with respect to claims 1 and 12 and because Lundby does not make up for the deficiencies of Funato.

Accordingly, Applicants respectively request withdrawal of the rejections and allowance of claims 6, 10, 17 and 21.

(iii) Claims 8 and 19

Finally, claims 8 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,934,555 to Silva et al. ("Silva"). Applicants respectfully disagree and traverse these rejections for at least the following reasons.

Initially, Applicants note that claims 8 and 19 depend on either claims 1 and 12, and are, therefore, patentable over Funato and Silva for at least the reasons set forth above with respect to claims 1 and 12 and because Silva does not make up for the deficiencies of Funato.

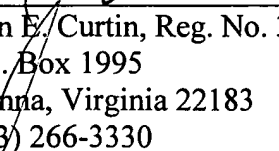
Accordingly, Applicants respectively request withdrawal of the pending rejections and allowance of claims 8 and 19.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact John E. Curtin at the telephone number listed below. If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 50-3777 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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By



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